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7 IN THE UNITED STATES DISTRICT COURT
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 FAMILIAS UNIDAS POR LA JUSTICIA,
11 AFL-CIO, a labor organization

12 Plaintiff,

13 v.

14 UNITED STATES DEPARTMENT OF
15 LABOR, and LORI CHAVEZ-DeREMER, in
16 her official capacity as United States Secretary
17 of Labor,

Defendants.

CASE NO. C24-0637JHC

**JOINT STIPULATION FOR ORDER
EXTENDING NOTING DATE ON
DEFENDANTS' MOTION TO
ALTER OR AMEND
PRELIMINARY INJUNCTION &
ORDER**

(Note on Motion Calendar for:
April 18, 2025)

18 WHEREAS on April 14, 2025, Defendants filed a motion to alter or amend the preliminary
19 injunction entered in this action on March 28, 2025 (Dkt. # 154); and

20 WHEREAS on April 15, 2025, the Court ordered that Defendants' motion be renoted to
21 April 24, 2025, and Plaintiff's opposition to the motion be filed by April 18, 2025; and

22 WHEREAS following the Court's April 15 hearing, the parties have engaged in negotiations
23 in pursuit of an agreement to modify the terms of the preliminary injunction and thereby make it
24 unnecessary for the Court to adjudicate Defendants' motion to alter or amend; and

25 WHEREAS the parties mutually agree that those discussions have been productive and that
26 they have made progress toward agreement, but they have not yet reached agreement; and

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28 JOINT STIPULATION FOR ORDER EXTENDING NOTING DATE ON
DEFENDANTS' MOTION TO ALTER OR AMEND
PRELIMINARY INJUNCTION & ORDER- 1
(Case No. C24-0637JHC)

1 WHEREAS the parties are mutually desirous of renoting Defendants' motion and extending
 2 the due date for Plaintiff's opposition to allow their negotiations to continue,

3 NOW THEREFORE, the parties, through their respective attorneys of record, do hereby
 4 stipulate and agree that the Court may make and enter the following order:

5 **Defendants' motion to alter or amend the second preliminary injunction pursuant to
 6 Rule 59(e), Fed. R. Civ. P., (Dkt. # 154) shall be renoted to April 29, 2025. Plaintiff's
 7 time to respond to Defendants' motion shall be extended to April 23, 2025.**

8 SO STIPULATED.

9 DATED this 18th day of April 2025.

10 TEAL LUTHY MILLER
 11 Acting United States Attorney

12 */s/ Brian C. Kipnis*
 13 BRIAN C. KIPNIS
 14 Assistant United States Attorney
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17 Attorneys for Defendants

18 SO STIPULATED.

20 DATED this 18th day of April 2025.

21 COLUMBIA LEGAL SERVICES

22 *s/ Andrea Schmitt*
 23 Andrea Schmitt, WSBA #39759
 24 711 Capitol Way S., Ste. 706
 Olympia, WA 98501
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26 Attorneys for Plaintiff

28 JOINT STIPULATION FOR ORDER EXTENDING NOTING DATE ON
 DEFENDANTS' MOTION TO ALTER OR AMEND
 PRELIMINARY INJUNCTION & ORDER- 2
 (Case No. C24-0637JHC)

ORDER

IT IS SO ORDERED.

DATED this 21st day of April 2025.

John H. Chun
JOHN H. CHUN
United States District Judge

**JOINT STIPULATION FOR ORDER EXTENDING NOTING DATE ON
DEFENDANTS' MOTION TO ALTER OR AMEND
PRELIMINARY INJUNCTION & ORDER- 3
(Case No. C24-0637JHC)**